



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Re: 3d (Internal)

116951

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MAR 22 1993

Enforcement Confidential

MEMORANDUM

SUBJECT: Comments on the Draft Proposed Plan for the Novak Sanitary Landfill, South Whitehall Township, PA

FROM: Elisabeth Freed, Regional Coordinator *E Freed*
CERCLA Enforcement Division, Compliance Branch

TO: Cesar Lee, Remedial Project Manager
Hazardous Waste Management Division, Southeast PA Section

Thank you for giving me the chance to review the draft Proposed Plan for the Novak Sanitary Landfill Superfund Site. The draft was reviewed by a team. The following comments are arranged in chronological order. The ones marked with an asterisk are considered major comments. Please let me or my Section Chief, Neilima Senjalia, know if you do not plan to address them. Our phone numbers are (703) 603-8974 and (703) 603-9004, respectively.

• Introduction

- * 1. Since you are actively seeking public comments, the Plan should emphasize the importance of public involvement and that their comments can change the preferred remedy.
- 2. In your second paragraph please add "as amended" after CERCLA.

• Site Background

- * 3. The maps (5-1 & 5-2) are not really helpful, readable, or necessary. Because this is a public document, a one to two sentence explanation of the extent of contamination would probably suffice. What is harder to understand and probably of more importance to the public, is whether or not any homeowners are using water contaminated by the landfill. It should be spelled out clearly, especially because the risk assessment indicates that people are drinking water from contaminated wells. Where any of the wells sampled for metals?
- 4. What is the relationship of nitrate to the Site? The discussion about nitrates is confusing, please clarify.



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5. Was the water main extension due to contamination from the Novak Landfill?

- Scope and Role

* 6. Is "long term" being used instead of "principle" threat?

* 7. Does this proposed remedy represent the final action for this site?

8. What community relations activities have taken place to date?

- Summary of Site Risks

* 9. Do you have a table with the COCs, their concentrations, and MCLs/health-based levels? This would be very helpful.

10. It would be helpful to move the two paragraphs on page 6 to the beginning. This discussion establishes the risk perspective for the reader.

*11. The goal of the preferred remedy is to eliminate risk to human health and the environment.

12. Is it possible to reduce the bullets on risk results into a more condensed form?

*13. Are there any environmental risks? Are the sediments/surface water in Jordan Creek contaminated?

- Summary of Alternatives

*14. What happened to the presentation and evaluation of the other alternatives?

*15. Institutional controls should be a minor/supporting component of the entire remedy.

- Evaluation of Alternatives

*16. Do you have any remedies that satisfy all of the ARARs?

17. Is there a potential for contamination migration?

- State Acceptance

*18. What does it mean that the State supports the preferred alternative with comment?

cc: Neilima Senjalia
Pat Anderson (3HW21)

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